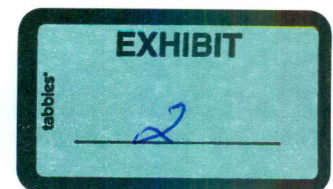


DECLARATION OF RAY STOEGBNER

I, Ray Stoebner, declare the following to be true and correct:

1. My name is Ray Stoebner. I am over the age of eighteen years, have never been convicted of a felony or crime of moral turpitude and am otherwise competent to make this affidavit. I am authorized to make this affidavit and have personal knowledge of the facts contained herein and those facts are true and correct.
2. I am a Manager in the Rig Division of C.C .Forbes, LLC. As a Manager, I am familiar with C.C. Forbes' business and its divisions.
3. C.C. Forbes has a Rig Division and a Coiled Tubing Division. The Rig Division and Coiled Tubing Division are distinct business units with each division providing different services. The Rig Division and Coiled Tubing Division have separate locations, provide different services, use different equipment, have separate management, and each division hires and manages their own employees who have different skills.
4. The Rig Division has rig yards located in West Texas, East Texas, South Texas and one in Pennsylvania. I am the Manager of two rig yards in the Rig Division. I manage the rig yards located in Giddings, Texas and Edna, Texas. Each of the other rig yards has a different Manager.
5. The Coiled Tubing Division has one yard located in Pleasanton, Texas with its own Manager.
6. The Rig Division provides services on lower pressure wells. The Coiled Tubing Division provides services on higher pressure wells. The services are so different that seldom would a work over rig and coiled tubing rig be on the same well. In my 35 years of experience I can recall only one time when both rigs were at a well at the same time and it was due to a very unique difficulty on that particular well.
7. The Rig Division provides work over rig services to oil companies. The Rig Division uses 350-600 HP work over rigs with an average size derrick of 106' rated for 250,000 pounds. A copy of a CC Forbes' work over rig is attached. Depending on location, a work over rig crew of the Rig Division consists of between 4-6 employees, generally with a supervisor, a driller that operates the work over rig, a derrick man who works in the air racking the tubing in the board and two floor hands operating the tubing tongs, elevators and slips. Some customers require an extra man on the crew. Floor hands use the elevators to latch onto individual joints of pipe that are 30-31 feet in length; use heavy tongs to connect/disconnect the separate joints of pipe and slips to keep the pipe from dropping into the well bore.



8. The Coiled Tubing Division employees do not operate work over rigs, do not work in the air on a derrick and do not have floor hands using elevators, tongs or slips. Rather it has employees who operate a completely different type of rig, a coil tubing rig that provides one continuous string of pipe that is up to 23,500 feet in length. This rig does not have a derrick.
9. Some rig yards in the Rig Division provide additional services with additional specialized equipment and the necessary crew to operate the specialized equipment, including reverse units with a reverse unit operator, swab units with a swab unit operator and a power swivel unit with a power swivel operator. These services are distinct and use specialized equipment. The Edna and Giddings yards do not have this specialized equipment.
10. The Coiled Tubing Division does not have any of this specialized equipment.
11. As a Manager in the Rig Division, I am familiar with the duties of a Manager for the Rig Division. The Managers are responsible for managing the rig yard under the Manager's supervision. The Manager, along with the supervisors of the rig yard, make the decisions relating to hiring and firing of employees at their rig yard, they discipline the employees, set the employees hours of work and schedules and make the other day to day decisions relating to the management of the rig yard, its employees and equipment. Rig crews do not have any set hours; we schedule their work based on business needs.
12. The Managers and supervisors of the Rig Division are not involved with the management or supervision of the employees in the Coiled Tubing Division. We are not involved in decisions relating to hiring, firing or discipline of Coiled Tubing Division employees, we do not set their hours of work nor their schedules and we do not make any decisions relating to their management or supervision.
13. Rig Division employees wear uniforms and use equipment with "CC Forbes" inscribed on it.
14. The pay for employees of the Rig Division varies by job duties and location. Many of the employees at the rig yards do not and have not received any bonus; they are not paid a daily bonus. Some employees at some of the rig yards receive a bonus on some occasions based on the type of work performed or their actual performance. Some employees are not entitled to a bonus at any time.
15. The Managers and supervisors in the Rig Division are not involved in setting the pay for employees of the Coiled Tubing Division. I do not how much employees in the Coiled Tubing Division are paid and I do not know whether they receive bonuses.
16. The Rig Division does not provide "man camps" or apartments for its employees.
17. The Rig Division does not share employees with the Coiled Tubing Division. Employees working for the Rig Division and the Coiled Tubing Division are not interchangeable. I am not aware of any instances when employees of the Rig Division worked for the Coiled Tubing Division nor instances when employees of the Coiled Tubing Division worked for the Rig Division.

18. Below is a general description of the duties of the non-management/non-supervisory employees of the Rig Division:

Clerk: Clerks perform administrative tasks, such as data entry, filing, correspondence, maintaining certain records, and processing paper work, such as entering time, payroll records, processing status change, managing tickets and the purchase order process; retrieving data and ensuring all invoices, quotes, tickets, and purchase orders are received and processed.

Floorhand: Conducts routine and pre-use equipment inspections of the Rig Division's equipment. Assists the work over rig driller during operations which require running tally (counting pipe) and using work over rig equipment (tongs, slips, elevators, winch line) during drilling operations. Assists work over rig driller with pulling and running pipe into and out of well and make and break connections. Assist work over rig driller in running casing into the well. Ensures fuel levels are accurately inventoried and maintained-replenishes fuel as needed. Performs routing maintenance on work over rig. Installs pit liner in pit prior to commencement of drilling operations, if applicable. Participates in housekeeping activities: cleaning, washing, and painting of work over rig and its support equipment.

Derrick: Responsible for all work performed from the rod basket (high in the air on the derrick) and tubing board (transferring rods and tubing from the vertical racks to the elevators) on a work over rig; operates the elevators for the work over rig; assists in manually lifting the tubing from the rack onto the floor or vice versa; assists in the rigging up/down of the work over rig well service unit by lifting, operating rig up and rig down guy-wires, hydraulic jacks, pads/boards; works the floor operates the pump when necessary.

Operator: Controls the work over rig carrier and derrick that pulls tubing in and out of the well bore; operates the rig and pump, is responsible to ensure rig maintenance and drives the rig.

Driver: Transports the heavy equipment to and from location and provides other help as needed.

Mechanic: Supervises and participates in the mechanical maintenance and repair of all engines and equipment, including equipment in yard and on location, rigs, auxiliary equipment, diesel engines, air compressors, pumps, draw works, blow out preventers, pickups; services and diagnoses faults, diverts and/or carries out necessary repairs. Liaises with maintenance engineer in planning and scheduling preventive maintenance program on rig division equipment. Implements and follows up on preventive maintenance program. Repairs and maintenance of; mechanic work on rigs and auxiliary equipment.


Welder: Responsible for permanently joining metal parts using high heat application to form a permanent bond. May specialize in one of hundreds of different processes of welding to join metals together

Swab Operator, Reverse Unit Operator, and Power Swivel Operator: Operates specialized equipment.

Swab Helper: Assists the swab operator; helps keep rig and equipment clean.

19. I am aware of Texas Energy; it is a separate company from C.C. Forbes and provides different services, such as vacuum trucks and fluids. I have no control over Texas Energy or its employees and Texas Energy does not control my employees.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this ____ day of November 2015.


Ray Stöckner

